


APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J.

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New York, NY 10005

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The deadline for Plaintiff to move for default judgment is hereby extended to September 6, 2024.

Dated: August 26, 2024

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August 13, 2024

**Via ECF**

Judge Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square, Room 415  
New York, New York 10007

Re: *Bozzuto Management Company v. Starr Indemnity & Liability Company*  
(Case No. 1:24-cv-04305(VSB))

Dear Judge Broderick:

We are counsel to Plaintiff Bozzuto Management Company. We submit this letter motion to respectfully request a two (2) week extension of time for the Plaintiff to comply with this Court's August 5, 2024 Order to either file a motion for a Default Judgment against Defendant Starr Indemnity & Liability Company ("Defendant") or commence prosecution of this Action.

The reason for this request is that, while Plaintiff and Defendant have reached an agreement in principle on the issues raised in this Action, they are still waiting for confirmation that a cross-claim initiated by a third-party against Plaintiff in a related Florida action will be dismissed as part of the parties' settlement. We are hopeful that we will be able to resolve the cross-claimant dismissal issue within the requested two (2) week extension period.

This is the first request for an extension of time to comply with this Court's August 5, 2024 Order.

Thank you for your consideration.

Respectfully submitted,

  
Alan A. Heller (AH-7942)

cc: Ms. Stephanie L. Smith (via email [Stephanie.Smith@starrcompanies.com](mailto:Stephanie.Smith@starrcompanies.com))  
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